

Pamela M. Egan, WSBA No. 54736
POTOMAC LAW GROUP PLLC
1905 7th Ave. W
Seattle, WA 98119
Telephone: (415) 297-0132
Email: pegan@potomacclaw.com
Attorneys for Mark D. Waldron, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON**

In re: GIGA WATT, Inc., a Washington corporation, Debtor.	Case No. 18-03197 FPC 7 The Honorable Frederick P. Corbit Chapter 7 CHAPTER 7 TRUSTEE'S MOTION FOR ALLOWANCE OF AND AUTHORITY TO PAY CHAPTER 7 ADMINISTRATIVE CLAIMS (STORAGE AND EQUIPMENT)
--	--

Mark D. Waldron, in his capacity as the duly-appointed Chapter 7 Trustee, by and through his attorneys, moves the Court for an Order, in the form attached hereto as **Exhibit A**, granting the authority to pay the following two invoices for necessary and reasonable services rendered post-conversion, i.e., on or after

October 1, 2020:

Provider Name	Service Provided	Date of Service	Amount
Insta-Stor	Storage Rental (2 mos.)	Oct.-Nov. 2020	\$270.50
NCW	Record Storage (1 month)	October 2020	\$75.00
	Supervision of Allrise Equipment Removal (5 hr. @ \$125/hr.)	October 15, 2020	\$625.00

Motion for Authority to Pay
Chapter 7 Administrative Expenses
(Storage and Equipment Removal) - Page | 1

1 This Motion is brought pursuant to 11 U.S.C. §§ 363, 503(b)(1), and
2 726(b). This case converted to one under Chapter 7 on September 30, 2020. *See*
3 Order Converting Case, [ECF No. 744](#). The estate has \$796,359.66 in cash.

4 A copy of the invoice from Insta-Stor, Inc. (“Insta-Stor”) is attached hereto
5 as **Exhibit B**. This invoice reflects the cost to the estate of renting two trailers for
6 storage purposes for two months post-conversion: October 2020 through
7 November 2020.

8 A copy of the invoice from NCW Consulting LLC (“NCW”) is attached
9 hereto as **Exhibit C**. The principal of NCW is Lauren Mieke, who managed and
10 operated the Debtor’s Moses Lake and TNT facilities before conversion. NCW
11 held various records of the estate for one month after conversion. NCW held the
12 records in a locked facility in Wenatchee, Washington, until Mr. Mieke delivered
13 the records to the Trustee in Tacoma, Washington. The Trustee has since been
14 holding the records in a locked area that has a security camera. NCW has charged
15 \$75 for its post-conversion services with respect to the records.

16 Furthermore, on October 15, 2020, NCW supervised the removal by Allrise
17 Financial Group of various equipment pursuant to the *Order Granting Motion of*
18 *the Chapter 11 Trustee for An Order Approving Settlement With Allrise and*
19 *Granting Related Relief*, filed on September 24, 2020, ECF No. [733](#). NCW charged
20 the rate of \$125 per hour and spent five hours supervising the equipment removal.

21 In the Trustee’s judgment, these expenses were reasonable and necessary.

1 Wherefore, the Plaintiff respectfully requests that the Court enter an Order
2 in the form attached hereto a:

3 1. Allow the claim of Insta-Stor in the amount of \$270.50 as an
4 administrative claim of the Chapter 7 estate and authorize the Trustee to pay
5 \$270.50 to Insta-Stor from funds of the estate;

6 2. Allow the claim of NCW in the aggregate amount of \$700 as an
7 administrative claim of the Chapter 7 estate and authorize the Trustee to pay \$700
8 to NCW from funds of the estate; and

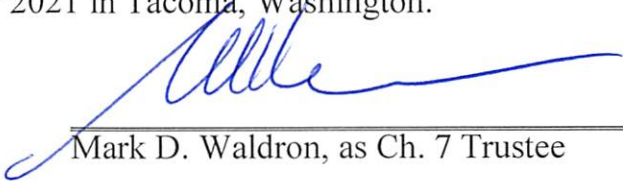
9 3. Grant such other and further relief as the Court considers just and
10 appropriate.

11 Dated: February 15, 2021 POTOMAC LAW GROUP PLLC

12
13 By: /s/ Pamela M. Egan
14 Pamela M. Egan (WSBA No. 54736)
15 *Attorneys for Mark D. Waldron, Chapter 7*
16 *Trustee, Plaintiff*

17 I, Mark D. Waldron, declare based on my personal knowledge, that the
18 foregoing is true and correct.

19 Dated this 17th day February 2021 in Tacoma, Washington.

20 
21 _____
22 Mark D. Waldron, as Ch. 7 Trustee

23 Motion for Authority to Pay
24 Chapter 7 Administrative Expenses
25 (Storage and Equipment Removal) - Page | 3